

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a BRAZOS  
LICENSING AND DEVELOPMENT,

Plaintiff,

v.

DELL TECHNOLOGIES INC., DELL INC.,  
AND EMC CORPORATION,

Defendants.

Case No. 6:20-cv-00475-ADA

**JURY TRIAL DEMANDED**

**LETTER OF REQUEST FOR FOREIGN DISCOVERY**

Defendants Dell Technologies Inc., Dell Inc., and EMC Corporation, (collectively “Defendants”) seek foreign discovery from third party witnesses residing in France. Defendants have attached an Appendix with a Letter of Request which includes Document Requests and Deposition Topics. Defendants respectfully request that the Court execute the Letter of Request attached as Appendix B. Defendants further request that, after the Court has signed the Letter of Request, the Clerk of this Court authenticate the Court’s signature under the seal of this Court, and return the original signed and sealed executed Letter, and two certified copies of the signed and sealed executed Letters, to Defendants’ counsel, Barry K. Shelton, for delivery to the proper authority.

Plaintiff, WSOU Investments, LLC d/b/a Brazos Licensing and Development, indicated that it reserves the right to serve its own foreign discovery in the future.

Dated: November 6, 2020

By: /s/ Barry K. Shelton

Barry K. Shelton  
Texas State Bar No. 24055029  
bshelton@sheltoncoburn.com  
**SHELTON COBURN LLP**  
311 RR 620, Ste. 205  
Austin, TX 78734-4775  
Telephone: 512.263.2165  
Facsimile: 512.263.2166

*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

The undersigned certifies that on November 6, 2020, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(b)(1).

*/s/ Barry K. Shelton*  
Barry K. Shelton